

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 3 CASES LISTED IN
EXHIBIT A OF PLAINTIFFS' NOTICE OF
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT REPLY OF
JAIME L. SEPULVEDA-TORO, M.D. FOR WAVE 3**

Come now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert reply filed against Jaime L. Sepulveda-Toro, M.D. for Ethicon Wave 1, Dkt. 2225. While Defendants filed a "new" response in opposition in Wave 3, this response largely repackages their Wave 1 Response (in many places it is simply copied and pasted) and fails to address the new argument presented by Plaintiffs in Wave 3. As such, Plaintiffs respectfully request the Court grant Plaintiffs' motion, for the reasons expressed in the Wave 1 briefing, and the additional argument presented in Wave 3.

Dated: October 21, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Aimee H. Wagstaff

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